

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO ALL CASES	

CROSS NOTICE OF DEPOSITION OF DR. MENG CHEN

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of DR. MENG CHEN will be taken jointly in connection with *In Re Pelvic Mesh/Gynecare Litigation*, Superior Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10, upon oral examination on October 3 (and if necessary, October 4), at the offices of Riker Danzig, One Speedwell Avenue, Morristown, NJ 07962-1981, at a time to be determined.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, and Rule 4:14 of the New Jersey Rules of Court, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re Pelvic Mesh/Gynecare Litigation*, Superior

Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10
and in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer
oaths.

Dated: October 2, 2012.

Respectfully submitted,

/s/Christy D. Jones
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JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones
Christy D. Jones

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